

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA : CRIMINAL NO: 24-_____

v. : DATE FILED: _____

PHILIP C. PULLEY : VIOLATIONS:
: **52 U.S.C. § 10307(c) (voter**
: **registration fraud - 1 count)**
: **52 U.S.C. § 10307(e) (voting more**
: **than once in a federal election - 2**
: **counts)**
: **52 U.S.C. § 20511(2) (voter fraud - 2**
: **counts)**

INFORMATION

COUNT ONE

THE UNITED STATES ATTORNEY CHARGES THAT:

At all times material to this information:

1. Defendant PHILIP C. PULLEY was a United States citizen residing in Huntingdon Valley, in Montgomery County, in the Eastern District of Pennsylvania.
2. Since in or about August 1996, defendant PHILIP C. PULLEY was registered to vote in Montgomery County, Pennsylvania, and from 2005 through 2023 had a history of voting using his Huntingdon Valley address.
3. On or about August 1, 2018, while maintaining his home address and voter registration in Montgomery County, Pennsylvania, defendant PHILIP C. PULLEY also registered to vote in Broward County, Florida, using as his home address an address in Lighthouse Point, Florida.

4. On or about February 10, 2020, while maintaining his home address and voter registration in Montgomery County, Pennsylvania, and his voter registration in Broward County, Florida, defendant PHILIP C. PULLEY also completed a voter registration application to vote in Philadelphia County, Pennsylvania. On his Philadelphia County voter registration form, defendant PULLEY provided false information about his address, his previous address, and his social security number.

5. On or about October 22, 2020, defendant PHILIP C. PULLEY applied for a mail-in ballot to vote in Philadelphia County in the 2020 general election, which included the race for President and Vice President of the United States.

6. Prior to November 3, 2020, defendant PHILIP C. PULLEY applied for and submitted an absentee ballot in Broward County, Florida, in the 2020 general election, and that ballot included his vote in the race for President and Vice President of the United States.

7. On or about November 3, 2020, defendant PHILIP C. PULLEY voted in-person at the polls in Montgomery County, Pennsylvania, in the 2020 general election, which included a second vote in the race for President and Vice President of the United States.

8. On or about November 3, 2022, defendant PHILIP C. PULLEY voted early in Broward County, Florida, in the 2022 general election.

9. On or about November 8, 2022, defendant PHILIP C. PULLEY voted in-person at the polls in both Montgomery and Philadelphia Counties, in Pennsylvania, in the 2022 general election, which included voting twice for the office of United States Senator.

10. On or about February 10, 2020, in Philadelphia, in the Eastern District of Pennsylvania, defendant

PHILIP C. PULLEY

knowingly and willfully gave false information as to his name, address, and period of residence in the voting district for the purpose of establishing his eligibility to register or vote, and he did so for the purpose of establishing his eligibility to register and to vote in a general, special, and primary election held solely and in part for the purpose of electing any candidate for the office of President, Vice President, presidential elector, Member of the United States Senate, and Member of the United States House of Representatives. Specifically, defendant PULLEY provided false information on his voter registration application about his address to establish his eligibility to vote in Philadelphia County so that he could vote in the 2020 general election that included the election for President and Vice President of the United States.

In violation of Title 52, United States Code, Section 10307(c).

COUNT TWO

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

At all times material to this information:

1. Paragraphs 1 through 9 of Count One are realleged here.
2. On or about February 10, 2020, in Philadelphia, in the Eastern District of Pennsylvania, defendant

PHILIP C. PULLEY

knowingly and willfully deprived, defrauded, and attempted to deprive and defraud the residents of the Commonwealth of Pennsylvania of a fair and impartially conducted election process by the procurement and submission of voter registration applications that were known by him to be materially false, fictitious, and fraudulent under the laws of the Commonwealth of Pennsylvania. Specifically, defendant PULLEY submitted his voter registration application to vote in Philadelphia County, knowing that application contained materially false information about his address, his previous address, and his social security number.

In violation of Title 52, United States Code, Section 20511(2)(A).

COUNT THREE

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

At all times material to this information:

1. Paragraphs 1 through 9 of Count One are realleged here.
2. On or about November 3, 2020, in the Eastern District of Pennsylvania,

and elsewhere, defendant

PHILIP C. PULLEY

knowingly, willfully, and expressly for the purpose of having his vote count more than once, voted more than once in a general election held solely and in part for the purpose of selecting and electing a candidate for the office of President, Vice President, presidential elector, Member of the United States Senate, and Member of the United States House of Representatives.

Specifically, defendant PULLEY voted twice for the office of President and Vice President of the United States, first in Broward County, Florida, and then in Montgomery County, Pennsylvania.

In violation of Title 52, United States Code, Section 10307(e).

COUNT FOUR

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

At all times material to this information:

1. Paragraphs 1 through 9 of Count One are realleged here.
2. On or about November 8, 2022, in the Eastern District of Pennsylvania,

and elsewhere, defendant

PHILIP C. PULLEY

knowingly, willfully, and expressly for the purpose of having his vote count more than once, voted more than once in a general election held solely and in part for the purpose of selecting and electing a candidate for the office of President, Vice President, presidential elector, Member of the United States Senate, and Member of the United States House of Representatives.

Specifically, defendant PULLEY voted twice for the office of United States Senator, once in Montgomery County, Pennsylvania, and once in Philadelphia County, Pennsylvania.

In violation of Title 52, United States Code, Section 10307(e).

COUNT FIVE

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

At all times material to this information:

1. Paragraphs 1 through 9 of Count One are realleged here.
2. On or about November 8, 2022, in the Eastern District of Pennsylvania, and elsewhere, defendant

PHILIP C. PULLEY

knowingly and willfully deprived, defrauded, and attempted to deprive and defraud the residents of the Commonwealth of Pennsylvania of a fair and impartially conducted election process by the procurement, casting, and tabulation of ballots that are known by him to be materially false, fictitious, and fraudulent under the laws of the Commonwealth of Pennsylvania. Specifically, defendant PULLEY cast a fraudulent ballot in Philadelphia County for the office of United States Senator, knowing that vote was fraudulently cast because, to qualify to vote, defendant PULLEY had lied on his Philadelphia County voter registration about his address in order to qualify to vote in Philadelphia County.

In violation of Title 52, United States Code, Section 20511(2)(B).

Christine E. Ayers, Esq.

**JACQUELINE C. ROMERO
UNITED STATES ATTORNEY**

No. _____

UNITED STATES DISTRICT COURT

Eastern District of Pennsylvania

Criminal Division

THE UNITED STATES OF AMERICA

v.

PHILIP C. PULLEY

INFORMATION

Counts

52 U.S.C. § 10307(c) (voter registration fraud - 1 count)
52 U.S.C. § 10307(e) (voting more than once in a federal election - 2 counts)
52 U.S.C. § 20511(2) (voter fraud - 2 counts)

A true bill.

Foreperson
Filed in open court this _____ day,
Of _____ A.D. 20 _____.

Foreperson

Bail, \$ _____